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12 Attorneys for Defendant Younique, LLC

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**
16

17 MEGAN SCHMITT, DEANA
REILLY, CAROL ORLOWSKY, and
18 STEPHANIE MILLER BRUN,
individually and on behalf of
19 themselves and all others similarly
situated,

20 Plaintiffs,

21 v.

22 YOUNIQUE, LLC

23 Defendant.
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Case No. 8:17-cv-01397-JVS-JDE

The Hon. James V. Selna
Santa Ana, Courtroom 10C

DEFENDANT YOUNIQUE, LLC'S
OBJECTIONS TO PLAINTIFFS'
NOTICE OF RULE 30(b)(6)
DEPOSITION AND FIRST REQUEST
FOR PRODUCTION OF
DOCUMENTS

Date: July 17, 2018
Time: 9:00 a.m.
Place: Anderson & Karrenberg
50 Broadway, Ste. 700
Salt Lake City, UT 84101

SACC filed: January 4, 2018
Trial Date: February 19, 2019

1 Defendant Younique, LLC ("Younique") hereby objects to Plaintiffs'
2 F.R.C.P. 30(b)(6) Notice of Deposition and the attached Plaintiffs' First Request for
3 Production of Documents set for deposition on July 17, 2018 (the "Notice and
4 Requests") on the following grounds:

5 **GENERAL OBJECTIONS**

6 A. Younique will not be available at the date and time unilaterally
7 selected by Plaintiffs for the deposition. Younique will be available for deposition at
8 a mutually agreed upon date and time.

9 B. Younique objects to the extent that the deposition seeks
10 information protected from disclosure by the attorney-client privilege and attorney
11 work product protection.

12 C. Younique objects that the deposition seeks information that
13 constitutes highly confidential trade secret or proprietary information.

14 D. Younique objects that the deposition seeks information that is
15 not reasonably calculated to lead to the discovery of admissible evidence.

16 **OBJECTIONS TO LIST OF TOPICS**

17 1. TOPIC 1. The existence, location, and custodian of the
18 categories of documents and things described in Plaintiffs' Request for Production
19 of Documents dated February 14, 2018.

20 OBJECTION: Younique incorporates here its above-stated General
21 Objections. Additionally, Younique objects on the grounds that the request is vague
22 and ambiguous as stated.

23 Without waiving the foregoing, Younique responds that pursuant to
24 F.R.C.P. 30(b)(6), upon resolution of these objections it will designate a person
25 most knowledgeable for deposition at a mutually agreed upon time and place.
26

27 2. TOPIC 2. The ingredients used in Younique Moonstruck 3D
28 Fiber Lashes from 2012 to the present.

1 OBJECTION: Younique incorporates here its above-stated General
2 Objections. Additionally, Younique objects on the grounds that the request is vague
3 and ambiguous as stated. Younique further objects that the time period provided is
4 overbroad, as the operative complaint is clear that Younique only manufactured,
5 sold and distributed the product at issue until 2015.

6 Without waiving the foregoing, Younique responds that pursuant to
7 F.R.C.P. 30(b)(6), upon resolution of these objections it will designate a person
8 most knowledgeable for deposition at a mutually agreed upon time and place.
9

10 3. TOPIC 3. The labeling and packaging of the Younique
11 Moonstruck 3D Fiber Lashes from 2012 to the present.

12 OBJECTION: Younique incorporates here its above-stated General
13 Objections. Younique further objects that the time period provided is overbroad, as
14 the operative complaint is clear that Younique only manufactured, sold and
15 distributed the product at issue until 2015.

16 Without waiving the foregoing, Younique responds that pursuant to
17 F.R.C.P. 30(b)(6), it will designate a person most knowledgeable for deposition at a
18 mutually agreed upon time and place.
19

20 4. TOPIC 4. The channels of distribution for the Younique
21 Moonstruck 3D Fiber Lashes from 2012 to the present.

22 OBJECTION: Younique incorporates here its above-stated General
23 Objections. Additionally, Younique objects on the grounds that the request is vague
24 and ambiguous as stated. Younique further objects that the time period provided is
25 overbroad, as the operative complaint is clear that Younique only manufactured,
26 sold and distributed the product at issue until 2015.
27
28

1 Without waiving the foregoing, Younique responds that pursuant to
2 F.R.C.P. 30(b)(6), upon resolution of these objections it will designate a person
3 most knowledgeable for deposition at a mutually agreed upon time and place.
4

5 5. TOPIC 5. The price of the Younique Moonstruck 3D Fiber
6 Lashes from 2012 to the present.

7 OBJECTION: Younique incorporates here its above-stated General
8 Objections. Younique further objects that the time period provided is overbroad, as
9 the operative complaint is clear that Younique only manufactured, sold and
10 distributed the product at issue until 2015.

11 Without waiving the foregoing, Younique responds that pursuant to
12 F.R.C.P. 30(b)(6), it will designate a person most knowledgeable for deposition at a
13 mutually agreed upon time and place.
14

15 6. TOPIC 6. The sales of the Younique Moonstruck 3D Fiber
16 Lashes from 2012 to the present.

17 OBJECTION: Younique incorporates here its above-stated General
18 Objections. Younique further objects that the time period provided is overbroad, as
19 the operative complaint is clear that Younique only manufactured, sold and
20 distributed the product at issue until 2015.

21 Without waiving the foregoing, Younique responds that pursuant to
22 F.R.C.P. 30(b)(6), it will designate a person most knowledgeable for deposition at a
23 mutually agreed upon time and place.
24

25 7. TOPIC 7. Training of and materials provided to presenters.

26 OBJECTION: Younique incorporates here its above-stated General
27 Objections. Younique further objects that the topic is overly broad and unduly
28 burdensome. Younique further objects that the time period provided is overbroad,

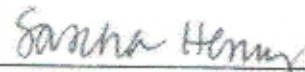
1 as the operative complaint is clear that Younique only manufactured, sold and
2 distributed the product at issue until 2015.

3
4 Without waiving the foregoing, Younique responds that pursuant to
5 F.R.C.P. 30(b)(6), it will designate a person most knowledgeable for deposition at a
6 mutually agreed upon time and place as to the training of and materials provided to
7 presenters relating to the product at issue in the complaint.

8
9 Dated: July 13, 2018

10 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

11
12 By



13 SASCHA HENRY

14 JONATHAN D. MOSS

15 ABBY H. MEYER

16 Attorneys for Defendant Younique, LLC
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1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 *Schmitt et al v. Yunique, LLC*
4 *USDC Case No. 8:17-cv-01397-JVS-JDE*

5 At the time of service, I was over 18 years of age and **not a party to this action**. I
6 am employed in the County of Los Angeles, State of California. My business address is
333 South Hope Street, 43rd Floor, Los Angeles, CA 90071-1422.

7 On July 13, 2018, I served true copies of the following document(s) described as
8 DEFENDANT YOUNIQUE, LLC'S OBJECTIONS TO PLAINTIFFS' NOTICE OF
RULE 30(b)(6) DEPOSITION AND FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS on the interested parties in this action as follows:

9 **SEE ATTACHED SERVICE LIST**

10 ☒ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package
11 addressed to the persons at the addresses listed in the Service List and placed the envelope
12 for collection and mailing, following our ordinary business practices. I am readily familiar
13 with the firm's practice for collecting and processing correspondence for mailing. On the
14 same day that correspondence is placed for collection and mailing, it is deposited in the
ordinary course of business with the United States Postal Service, in a sealed envelope
with postage fully prepaid. I am a resident or employed in the county where the mailing
occurred.

15 I declare under penalty of perjury under the laws of the United States of America
16 that the foregoing is true and correct and that I am employed in the office of a member of
the bar of this Court at whose direction the service was made.

17 Executed on July 13, 2018, at Los Angeles, California.

18
19 58ME-262661 (USDC CD CA - Santa Ana)

20 
21 _____
22 TRACY L. FIELDING
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12 Attorneys for Defendant Yunique, LLC

13
14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

16 MEGAN SCHMITT, DEANA
17 REILLY, CAROL ORLOWSKY, and
18 STEPHANIE MILLER BRUN,
individually and on behalf of
19 themselves and all others similarly
situated,

20 Plaintiffs,

21 v.

22 YOUNIQUE, LLC

23 Defendant.

Case No. 8:17-cv-01397-JVS-JDE

The Hon. James V. Selna
Santa Ana, Courtroom 10C

DEFENDANT YOUNIQUE, LLC'S
OBJECTIONS TO PLAINTIFFS'
SUBPOENA TO PRODUCE
DOCUMENTS, INFORMATION, OR
OBJECTS OR TO PERMIT
INSPECTION OF PREMISES IN A
CIVIL ACTION DIRECTED TO
COYNE PUBLIC RELATIONS

Production Date: July 23, 2018

SACC filed: January 4, 2018
Trial Date: Februarv 19, 2019

1 Defendant Younique, LLC hereby objects to Plaintiffs' Subpoena to
2 Produce Documents, Information, or Objects or to Permit Inspection of Premises in
3 a Civil Action directed to Coyne Public Relations, the notice of which was served
4 on Younique on July 12, 2018, on the following grounds.

5 **OBJECTION TO SUBPOENA**

6 **REQUEST FOR PRODUCTION NO. 1:**

7 All documents concerning Younique LLC, including but not limited to
8 Younique's "Moonstruck 3D Fiber Lashes" and "Younique Moodstruck 3D Fiber
9 Lashes +" products.

10
11 **OBJECTION TO REQUEST NO. 1:**

12 Younique objects to the issuance of this subpoena to the extent it is
13 being used to unduly burden and/or harass the vendors of Younique. Younique
14 objects to the issuance of this subpoena to the extent it calls for the production of
15 confidential documents in which Younique has a privacy interest. Younique objects
16 to the issuance of this subpoena to the extent it calls for the production of documents
17 that are privileged from production, including, without limitation, documents that
18 are protected by the privacy rights of third parties, trade secrets, or subject to non-
19 disclosure agreements.

20 Younique further objects to the issuance of the subpoena on the
21 grounds that it is overbroad. For one, the operative complaint is clear that Younique
22 only manufactured, sold and distributed the product at issue until 2015; however, the
23 request is not time-limited. Additionally, the only the Moodstruck 3D Fiber Lashes
24 product, not the Lashes+ product, is disputed by the operative complaint.
25 Consequently, a request for documents related to the Lashes+ product is outside the
26 scope of the complaint, rendering such documents irrelevant.


27 Finally, Younique objects on the grounds that Plaintiffs intend to serve
28 this discovery request after the discovery cut-off. Docket item 56-1 provides a June

1 1, 2018, discovery cut-off. During the parties' meet and confer which culminated in
2 the 5-29-18 Order Granting Stipulation to Modify Scheduling Order, Younique
3 made clear that it was only entering into the stipulation in order to give Plaintiffs
4 and Lori DeBell more time to appear for their depositions, and to permit a Rule
5 30(b)(6) deposition of Younique. The Order itself is clear that it extended to
6 July 30, 2018 the "last day to schedule and commence" just these depositions. The
7 Order further reads that, "Except as otherwise stated herein, the other dates and
8 deadlines in the December 11, 2017 Minute Order (Dkt. 56 & 56-1) and Order re:
9 Jury Trial (Dkt. 57) shall continue to apply." In short, service of this subpoena on
10 July 16, 2018, as stated in the notice of subpoena, would be improper. Younique
11 hereby requests that Plaintiffs do not serve the subpoena on this third-party.
12

13 Dated: July 13, 2018

14 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
15

16 By



SASCHA HENRY

JONATHAN D. MOSS

ABBY H. MEYER

Attorneys for Defendant Younique, LLC
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

Schmitt et al v. Yunique, LLC
USDC Case No. 8:17-cv-01397-JVS-JDE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 333 South Hope Street, 43rd Floor, Los Angeles, CA 90071-1422.

On July 13, 2018, I served true copies of the following document(s) described as DEFENDANT YOUNIQUE, LLC'S OBJECTIONS TO PLAINTIFFS' SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION DIRECTED TO COYNE PUBLIC RELATIONS on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

☒ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on July 13, 2018, at Los Angeles, California.

58ME-262661 (USDC CD CA - Santa Ana)


TRACY L. FIELDING

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12 Attorneys for Defendant Yunique, LLC

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14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

16 MEGAN SCHMITT, DEANA
17 REILLY, CAROL ORLOWSKY, and
18 STEPHANIE MILLER BRUN,
19 individually and on behalf of
themselves and all others similarly
situated,

20 Plaintiffs,

21 v.

22 YOUNIQUE, LLC

23 Defendant.
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Case No. 8:17-cv-01397-JVS-JDE

The Hon. James V. Selna
Santa Ana, Courtroom 10C

DEFENDANT YOUNIQUE, LLC'S
OBJECTIONS TO PLAINTIFFS'
NOTICE OF RULE 30(b)(6)
DEPOSITION

Date: July 27, 2018

Time: 9:00 a.m.

Place: Anderson & Karrenberg
50 Broadway, Ste. 700
Salt Lake City, UT 84101

SACC filed: January 4, 2018

Trial Date: February 19, 2019

1 Defendant Younique, LLC ("Younique") hereby objects to Plaintiffs'
2 second F.R.C.P. 30(b)(6) Notice of Deposition served on July 12, 2018 and set for
3 deposition on July 27, 2018, on the following grounds and will not designate a
4 witness or appear for this deposition.

5 **GENERAL OBJECTIONS**

6 A. Younique will not be available at the date and time unilaterally
7 selected by Plaintiffs for the deposition.

8 B. Younique objects to the extent that the deposition seeks
9 information protected from disclosure by the attorney-client privilege and attorney
10 work product protection.

11 C. Younique objects that the deposition seeks information that
12 constitutes highly confidential trade secret or proprietary information.

13 D. Younique objects to the extent that the deposition seeks
14 information that is not reasonably calculated to lead to the discovery of admissible
15 evidence.

16 **OBJECTIONS TO LIST OF TOPICS**

17 1. The cost of goods sold ("COGS") of the Younique Moodstruck
18 3D Fiber Lashes, including the components thereof.

19 OBJECTION: Younique incorporates here its above-stated General
20 Objections. Younique objects on the grounds that "including the components
21 thereof" is vague and ambiguous. Younique further objects that the time period
22 provided is overbroad, as the operative complaint is clear that Younique only
23 manufactured, sold and distributed the product at issue until 2015. Finally,
24 Younique objects on the grounds that this Rule 30(b)(6) notice was served past the
25 discovery cut-off. During the parties' meet and confer which culminated in the 5-
26 29-18 Order Granting Stipulation to Modify Scheduling Order, Younique made
27 clear that it was only entering into the stipulation in order to give Plaintiffs and Lori
28 DeBell more time to appear for their depositions, and to permit a Rule 30(b)(6)

1 deposition of Younique. The Order itself is clear that it extended to July 30, 2018
2 the "last day to schedule and commence" just these depositions. The Order further
3 reads that, "Except as otherwise stated herein, the other dates and deadlines in the
4 December 11, 2017 Minute Order (Dkt. 56 & 56-1) and Order re: Jury Trial (Dkt.
5 57) shall continue to apply." Docket item 56-1 provides a June 1, 2018, discovery
6 cut-off. Because this second Rule 30(b)(6) notice was served after the discovery
7 cut-off date, Younique will not designate witness to appear on this topic.

8
9 Dated: July 13, 2018

10 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

11
12 By



SASCHA HENRY

JONATHAN D. MOSS

ABBY H. MEYER

Attorneys for Defendant Younique, LLC

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

3 Schmitt et al v. Younique, LLC
4 USDC Case No. 8:17-cv-01397-JVS-JDE

5 At the time of service, I was over 18 years of age and **not a party to this action**. I
6 am employed in the County of Los Angeles, State of California. My business address is
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8 DEFENDANT YOUNIQUE, LLC'S OBJECTIONS TO PLAINTIFFS' NOTICE OF
RULE 30(b)(6) DEPOSITION on the interested parties in this action as follows:

9 SEE ATTACHED SERVICE LIST

10 ☒ **BY MAIL:** I enclosed the document(s) in a sealed envelope or package
11 addressed to the persons at the addresses listed in the Service List and placed the envelope
12 for collection and mailing, following our ordinary business practices. I am readily familiar
13 with the firm's practice for collecting and processing correspondence for mailing. On the
same day that correspondence is placed for collection and mailing, it is deposited in the
ordinary course of business with the United States Postal Service, in a sealed envelope
with postage fully prepaid. I am a resident or employed in the county where the mailing
occurred.

14 I declare under penalty of perjury under the laws of the United States of America
15 that the foregoing is true and correct and that I am employed in the office of a member of
the bar of this Court at whose direction the service was made.

16 Executed on July 13, 2018, at Los Angeles, California.

17
18 58ME-262661 (USDC CD CA - Santa Ana)

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20 TRACY L. FIELDING
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